

EXHIBIT A

AGREED CONSTRUCTIONS

Claim Term/Phrase	Parties' Agreed Construction	Where Term Appears In Asserted Claims	Court's Construction
"sanitary compliance zone"	"the portion of water, within the large water body, which is established for recreational purposes, and required to comply with specific microbiological sanitary conditions, when used for recreational purposes or when it is needed"	'520 patent—Claims 1 and 16	AGREED
"flocculating agent"	"chemical substance or compound that promotes the combination, agglomeration, or coagulation of suspended particles"	'822 patent—Claims 1 and 7	AGREED
"cationic polymer"	"polymer bearing a positive charge or incorporating cationic functional groups in its structure"	'822 patent—Claim 7	AGREED
"precipitated impurities"	"material that is forced out of a solution by some chemical reaction"	'822 patent—Claim 1	AGREED
"coupling means"	"coupler"	'514 patent—Claim 1	AGREED

DISPUTED CONSTRUCTIONS

Claim Term/Phrase	Defendant's Proposed Construction	Plaintiffs' Proposed Construction	Where Term Appears In Asserted Claims	Court's Construction
"walls"	"substantially vertical surface of the structure"	<p>Plain and ordinary meaning.</p> <p>If a construction is required: "structure that serves to hold back pressure."</p>	<p>'514 Patent—Claims 1 and 7</p> <p>'822 Patent—Claim 1</p>	
"covered with a plastic liner made of non-porous material able to be thoroughly cleaned"	"with a uniform plastic liner made of a non-porous material forming the exposed surface such that the exposed plastic liner can be thoroughly cleaned"	Plain and ordinary meaning.	'514 Patent—Claim 1	

Claim Term/Phrase	Defendant's Proposed Construction	Plaintiffs' Proposed Construction	Where Term Appears In Asserted Claims	Court's Construction
"fresh water feeding pipe system that allows entrance of fresh water and results in water removal by displacement of surface water through the skimmer system"	"new intake water feeding pipe system that allows entrance of new intake water into the structure and results in elimination of a substantially equivalent amount of water from the structure by displacement of surface water through the skimmer system"	Plain and ordinary meaning. If a construction of "fresh water" is required: "new water"	'514 Patent—Claim 1	
"feeding the water body with inlet water to generate displacement of surface water ... and removing displaced surface water using the skimmers"	"feeding the water body with new intake water to generate displacement of surface water ... and elimination of a substantially equivalent amount of displaced surface water from the structure using the skimmers"	Plain and ordinary meaning. If a construction of "fresh water" is required: "new water"	'822 Patent—Claim 1	

Claim Term/Phrase	Defendant's Proposed Construction	Plaintiffs' Proposed Construction	Where Term Appears In Asserted Claims	Court's Construction
"pumping system"	"pump and associated piping connected to a moveable suction device to remove settled debris and suspended solids from the surface of the plastic liner by suction of water mixed with the debris and suspended solids and disposal of that water mixed with debris suspended solids, removing them from the structure"	Plain and ordinary meaning. If a construction is required: "suction pump"	'514 Patent—Claim 1	
"moveable suction device"	"cleaning device for removal of debris and suspended solids that completely replaces a traditional filtering system together with the use of flocculants"	Plain and ordinary meaning. If a construction is required: "vacuum"	'514 Patent—Claim 1 '822 Patent—Claim 1	

Claim Term/Phrase	Defendant's Proposed Construction	Plaintiffs' Proposed Construction	Where Term Appears In Asserted Claims	Court's Construction
"delimiting zone"	"a virtual zone that delimits the sanitary compliance zone from the rest of the water body that is not treated"	"a virtual zone that delimits the sanitary-compliant zone, and does not require a physical barrier"	'520 patent—Claim 1	
"determining salinity of the water at the most unfavorable zone" / "determining the temperature of the water in the most unfavorable zone"	"testing or measuring the salinity of the water at the most unfavorable zone" / "testing or measuring the temperature of the water in the most unfavorable zone"	Plain and ordinary meaning. If a construction is required, "determining" should be construed to mean "to find out or come to a decision about by investigation, reasoning, or calculation"	'520 Patent—Claim 1	

Claim Term/Phrase	Defendant's Proposed Construction	Plaintiffs' Proposed Construction	Where Term Appears In Asserted Claims	Court's Construction
“determining the minimum ORP value based on the salinity of the water” / “determining the minimum period of time based on the water temperature”	“performing the provided calculation or choice for the minimum ORP value governed by the salinity of the water at the most unfavorable zone” / “performing the provided calculation or choice for the minimum period of time governed by the water temperature in the most unfavorable zone”	Plain and ordinary meaning. If a construction is required, “determining” should be construed to mean “to find out or come to a decision about by investigation, reasoning, or calculation”	'520 Patent—Claim 1	
“portion of water [within a water body]”	“part of the entire water body”	Plain and ordinary meaning.	'520 Patent—Claims 1, 9, and 14	